

**EPA REGISTRATION NUMBER 83525-5**

NEW APPLICATIONS

DATE: 2/8/12

FILE NUMBER: 83525-L

FEP (OPPIN ENTRY) per 2/8/12  
(Initial & date)

FILE ROOM: \_\_\_\_\_  
(Initial & date)

SIG: \_\_\_\_\_  
(Initial & date)

FILE ROOM: \_\_\_\_\_  
(Initial & date)

X ASSIGN TO PM -33 (NO DATA)

\_\_\_\_ JACKET TO SHELF (DATA)

# PRIA 2 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

3/23/09

21 Day Screen Start Date: 2-21-12 Release Date

Experts In-Processing Signature: MF Harrington Date 2-22-12 Fee Paid: Yes ☒

Division management contacted on issues No ☐ Yes ☐ Date \_\_\_\_\_

EPA Reg. Number: <u>83525-L</u>		EPA Receipt Date: <u>2-21-12</u>				
Items for Review				Yes	No	N/A*
1	<b>Application Form</b> (EPA Form 8570-1)(link to form) signed & complete including package type			X		
2	<b>Confidential Statement of Formula</b> all boxes completed, form signed, and dated (EPA Form 8570-4) (Link to form)			X		
	a) All inerts (link to <a href="http://www.epa.gov/opprd001/inerts/">http://www.epa.gov/opprd001/inerts/</a> ), including fragrances, approved for the proposed uses (see Footnote A)	yes	no			
	<u>No inerts</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>			
3	<b>Certification with Respect to Citation of Data</b> (EPA Form 8570-34) (Link to form) completed and signed (N/A if 100% repack)			X		
	Certificate and data matrix consistent			X		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no			
		<input type="checkbox"/>	<input type="checkbox"/>			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	<b>Formulator's Exemption Statement</b> (EPA Form 8570-27) (Link to form) completed and signed (N/A if source is unregistered or applicant owns the technical)			X		
	<b>Data Matrix</b> (EPA Form 8570-35) (Link to form) both internal and external copies (PR 98-5) (Link to PR 98-5) completed and signed (N/A if 100% repack)			X		
5	a) Selective Method (Fee category experts use)	yes	no			
		X	<input type="checkbox"/>			
	b) Cite-All (Fee category experts use)	<input type="checkbox"/>	<input type="checkbox"/>			
	c) Applicant owns all data (Fee category experts use)	<input type="checkbox"/>	<input type="checkbox"/>			
6	<b>5 Copies of Label</b> (link to <a href="http://www.epa.gov/oppfead1/labeling/lrm/">http://www.epa.gov/oppfead1/labeling/lrm/</a> ) (Electronic labels on CD are encouraged and guidance is available)( link to <a href="http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm#labels">http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm#labels</a> )			X		

Comments:

Passed §1-3 Review - MRIDs 487401 and 487426.  
487401 was missing the sponsor & study director signatures  
on the GLP and page 33 was cut off at the  
margin. Registrant sent corrected pages.

Technical and [REDACTED]

JD/ 3/1/12  
AB

\* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses. If an unapproved inert is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses **even if a product is currently registered** by consulting the inert Web

7	Is the data package consistent with PR Notice 86-5 (link to PRN 86-5)	X		
8	Notice of Filing (link to <a href="http://www.epa.gov/pesticides/regulating/tolerance_petitions.htm">http://www.epa.gov/pesticides/regulating/tolerance_petitions.htm</a> ) included with petitions (link to <a href="http://www.epa.gov/pesticides/regulating/tolerances.htm">http://www.epa.gov/pesticides/regulating/tolerances.htm</a> )			X
9	If applicable for conventional applications, reduced risk rationale (link to <a href="http://www.epa.gov/opprd001/workplan/reducedrisk.html">http://www.epa.gov/opprd001/workplan/reducedrisk.html</a> )			X
10	Required Data (link to <a href="http://www.epa.gov/pesticides/regulating/data_requirements.htm">http://www.epa.gov/pesticides/regulating/data_requirements.htm</a> ) and/or data waivers. See Footnote C.			
	a) List study (or studies) not included with application			

site [link to <http://www.epa.gov/oppr001/inerts/lists.html>] and if the inert is not approved, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at [inertsbranch@epa.gov](mailto:inertsbranch@epa.gov) and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch [Link to [http://www.epa.gov/oppbppd1/biopesticides/contacts\\_bppd.htm](http://www.epa.gov/oppbppd1/biopesticides/contacts_bppd.htm)].

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information [link to <http://www.epa.gov/oppr001/inerts/tips.pdf>] must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

### **Unapproved Inerts Identified on CSFs**

#### **All applications except conventional new products and PIPs**

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

#### Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R311, R312 or R313), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

#### PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.



## Script for Rejection Phone calls

**Contact Name:** Laird101ivie@aol.com

**Phone #:** 703-669-0509

**Email:** Olivia Laird

**First Call/Initials:**

**Date:** 2/28/12

**Time:** 10:30 AM

**Second Call/Initials:**

**Date:**

**Time:**

This is Jennifer Drobish, EPA contractor.

I'm calling regarding your submission in support of

Wegocide THPS 75.

We have found the following deficiencies regarding:

**PR Notice 2011-3: Yes or No**

**Volume/Study Title:** Chemistry: Wegocide THPS 75 -

GLP missing sponsor; study director signature and page 33 is cut off on the margin

**Volume/Study Title:**

**Volume/Study Title:**

**Additional volumes continued on back of page: Yes or No**

**Application Package: Yes or No**

**These deficiencies have been approved by EPA.**

**The corrections can be faxed to 703-305-5060/Attn: \_\_\_\_\_.**

**Second Call/Email:**

If we do not receive the corrections by \_\_\_\_\_, we will process your submission, accordingly. Please direct all future calls and correspondence to the appropriate EPA Risk Manager.



Fwd: Wegocide THPS 75 (83525-L)  
Olivia D. Laird  
to:  
Jennifer Drobish  
02/29/2012 01:19 PM  
Hide Details  
From: "Olivia D. Laird" <laird1olivia@aol.com>

To: Jennifer Drobish/DC/USEPA/US@EPA

1 Attachment



WEGO\_LETTER\_GLP\_STATEMENT.pdf

Designation attached

**Olivia D. Laird**, President/Owner  
Laird's Regulatory Consultants, Inc.  
Estates At Shenstone Farms  
17804 Braemar Place  
Leesburg, Virginia 20175-7046  
Office: 703-669-0509  
Email Address: [Laird1Olivia@aol.com](mailto:Laird1Olivia@aol.com)

*The future doesn't just happen, it is created...Our destiny is not in the stars, but in ourselves through our Lord Jesus the Christ. We must follow in the wake of those who have gone before us, but what we do and where we go is ultimately up to us. The attitude of initiative is an on going state of exploration that is never finished...a journey that never ends.*

-----Original Message-----

From: Carita Laird <caritalaird\_lrcinc@aol.com>  
To: laird1olivia <laird1olivia@aol.com>  
Sent: Wed, Feb 29, 2012 1:18 pm  
Subject: Re: Wegocide THPS 75 (83525-L)

Revised.

**Carita D. Laird**

Laird's Regulatory Consultants, Inc.  
17804 Braemar Place  
Leesburg, VA 20175-7046  
(703) 669-0509  
[CaritaLaird\\_LRCinc@aol.com](mailto:CaritaLaird_LRCinc@aol.com)

-----Original Message-----

From: Olivia D. Laird <[laird1olivia@aol.com](mailto:laird1olivia@aol.com)>  
To: caritalaird\_lrcinc <[caritalaird\\_lrcinc@aol.com](mailto:caritalaird_lrcinc@aol.com)>  
Sent: Wed, Feb 29, 2012 12:25 pm  
Subject: Fwd: Wegocide THPS 75 (83525-L)

**Olivia D. Laird**, President/Owner

Laird's Regulatory Consultants, Inc.  
Estates At Shenstone Farms  
17804 Braemar Place  
Leesburg, Virginia 20175-7046  
Office: 703-669-0509  
Email Address: [Laird1Olivia@aol.com](mailto:Laird1Olivia@aol.com)

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Re: Wegocide THPS 75 (83525-L)  
Olivia D. Laird  
to:  
Jennifer Drobish  
02/29/2012 12:02 PM  
Cc:  
Sree Nair  
Hide Details  
From: "Olivia D. Laird" <laird1olivia@aol.com>

To: Jennifer Drobish/DC/USEPA/US@EPA

Cc: Sree Nair/DC/USEPA/US@EPA

History: This message has been replied to.

2 Attachments



WEGO LETTER GLP STATEMENT.pdf PAGE 34 OF 67.pdf

Dear Jennifer:

Thank you for your Email pointing out the deficiencies. I want to first apologize for any inconveniences this may have cause. I have attached the Signed GLP Statement as well as page 34 of 67. Please let me know if there is anything else needed.

**Olivia D. Laird**, President/Owner  
Laird's Regulatory Consultants, Inc.  
Estates At Shenstone Farms  
17804 Braemar Place  
Leesburg, Virginia 20175-7046  
Office: 703-669-0509  
Email Address: [Laird1Olivia@aol.com](mailto:Laird1Olivia@aol.com)

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-----Original Message-----

From: Jennifer Drobish <Drobish.Jennifer@epamail.epa.gov>  
To: Laird1Olivia <Laird1Olivia@aol.com>  
Cc: Sree Nair <Nair.Sree@epamail.epa.gov>  
Sent: Tue, Feb 28, 2012 10:33 am  
Subject: Wegocide THPS 75 (83525-L)

Dear Ms. Laird,

This is Jennifer Drobish, EPA contractor. I'm writing in regards to your submission in support of the subject registration. We have found the following deficiency regarding PR Notice 11-3:

\*Chemistry: Wegocide THPS 75: The GLP is missing the sponsor and study director signatures and page 33 is cut off along the margin.

The corrections can either be faxed to me at 703-305-5060/Attn: Jennifer Drobish or emailed to me at this address. Please feel free to contact me if you have any questions.

Thank you,  
Jennifer Drobish  
Macfadden Contractor  
703-305-1671



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

February 21, 2012

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

OPP Decision Number: D-461239  
EPA File Symbol or Registration Number: 83525-L  
Product Name: WEGOCIDE THPS 75  
EPA Receipt Date: 08-Feb-2012  
EPA Company Number: 83525  
Company Name: WEGO CHEMICAL & MINERAL CORP.

BERT ESHAGHPOUR  
WEGO CHEMICAL & MINERAL CORP.  
239 GREAT NECK ROAD  
GREAT NECK, NY 11021-

SUBJECT: Receipt of Application and 75% Small Business Waiver Request

Dear Registrant:

The Office of Pesticide Programs has received your application, 75% small business waiver request, and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: A532  
UNREGISTERED SOURCE OF ACTIVE INGREDIENT;NEW PRODUCT;CITE-ALL DATA  
CITATION EXCEPT FOR PRODUCT CHEMISTRY;IDENTICAL OR SUBSTANTIALLY  
SIMILAR IN COMPOSITION AND USE TO A REGISTERED PRODUCT;PRODUCT  
CHEMISTRY DATA SUBMITTED;REGISTERED ACTIVE INGREDIENT;

Your request for waiver has been forwarded for review. You will be notified in writing when a determination is made regarding your request. If your waiver request is approved, the decision review time period will start on the date of approval. If your waiver request is denied, you will receive an invoice for the outstanding balance. If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-6427.

Sincerely,

A handwritten signature in black ink, appearing to be "m. z. h.", is written over the word "Sincerely,".

Front End Processing Staff  
Information Technology & Resources Management Division

## Fee for Service

{911338-~

This package includes the following

- ☒ New Registration
- ☐ Amendment

☒ Studies? ☒ Fee Waiver?

☐ volpay % Reduction: 75%

for Division

- ☒ AD
- ☐ BPPD
- ☐ RD

Risk Mgr. 33

Receipt No.

S-

911338

EPA File Symbol/Reg. No.

83525-L

Pin-Punch Date:

2/8/2012

☐ This item is NOT subject to FFS action.

### Action Code:

Requested:

Granted:

A532

Amount Due: \$ 4631.00

### Parent/Child Decisions:

☒ Inert Cleared for Intended Use



Uncleared Inert in Product

Reviewer: Team 1 (Eliza Blair) Date: 2/9/12

Remarks:

Receipt for Section 3

S: 911338

Regulatory Type: Product Registration - Section 3

Application Type: New Registration

Company: 83525 VEGO CHEMICAL & MINERAL CORP.

Risk Manager: Antimicrobials Division, Risk Management Team 33

Product #: 83525-L

Product Name: VEGOCIDE THPS 75

Override#:

Me Too Section3: 33677-3

Me Too Product Name: TOLCIDE PS75

Application Date: 04-Feb-2012

Front End Date: 08-Feb-2012

FFS Due Date:

OPP Target Date:

Fast Track:

Receipt Description: New registration

Form A:

Signature Date:

Resubmission: Yes No

Fee For Service: Yes No

Billable: Yes No

V

Print Letter

Enter More Information

Tracking

OPP Rec'd Date: 08-Feb-2012

Risk Manager Send Date:

Negotiated Due Date:

New Ingredient:

Request Date:

New Ingredient:

Received Date:

Signature Date:

Signature Date:

Receipt Content

Des

Study

Paper Label

View/Edit





**To:** Michael Yanchulis/DC/USEPA/US@EPA,  
**Cc:**  
**Bcc:**  
**Subject:** Re: URGENT: Immediate action required to avoid rejection of application to register  
Wegocide THPS 75 (EPA Symbol No. 83525-L)  
**From:** "Olivia D. Laird" <laird1olivia@aol.com> - Tuesday 02/21/2012 03:08 PM

---

History: This message has been replied to.

---

The check # is 28540 in the amount of \$458 and the date of the check is Feb. 13<sup>th</sup>.  
Please let me know if you need a copy of the check.

**Olivia D. Laird**, President/Owner  
Laird's Regulatory Consultants, Inc.  
Estates At Shenstone Farms  
17804 Braemar Place  
Leesburg, Virginia 20175-7046  
Office: 703-669-0509  
Email Address: [Laird1Olivia@aol.com](mailto:Laird1Olivia@aol.com)

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\*Commercial/financial information may be entitled to confidential treatment\*

5422


 **LAIRD'S REGULATORY CONSULTANTS, INC**  
(703) 669-0509  
17804 BRAEMAR PLACE  
LEESBURG, VA 20175

Image Enhanced Check Fraud  
Safe Protection for Business  
68-678-560

DATE 2/4/2012

PAY TO THE ORDER OF EPA Fee for Service \$ 700.00  
Seven Hundred and no/100 DOLLARS

THE MIDDLEBURG BANK  
MIDDLEBURG, VIRGINIA 20118

FOR Wegocide Olivia K. Laird

⑈00005422⑈

Check No 28540 \$458

## A532 – New product identical or substantially similar in composition and use to registered product.

- Registered active ingredient, unregistered source of active ingredient.
- Cite all data citation except for product chemistry. Must submit Group A and B product chemistry data for the end use product as well as the unregistered source.

End Use (EP) or Manufacturing Use (MP) product or Technical Grade of the Active Ingredient (TGAi)

Guideline No.	Group A: Product Chemistry Data Study Title	EP Data Submitted	MP Data Submitted	TGAi Data Submitted
830.1550	Product Identity & Composition	X		
830.1600	Description of materials used to produce the product	X		
830.1650	Description of formulation process	X		
830.1670	Discussion on the formation of impurities	X		
830.1700	Preliminary analysis	X		
830.1750	Certified limits (158.345)	X		
830.1800	Enforcement analytical method	X		

Guideline No.	Group B: Product Chemistry Data Study Title	EP Data Submitted	MP Data Submitted	TGAi Data Submitted
830.6302	Color	X		
830.6303	Physical State	X		
830.6304	Odor	X		
830.6313	Stability to normal and elevated temperatures metal and metal ions			
830.6314	Oxidation/Reduction (Chemical incompatibility)	X		
830.6315	Flammability	X		
830.6316	Explosibility	X		
830.6317	Storage stability*	X		
830.6319	Miscibility	X		
830.6320	Corrosion Characteristics*	X		
830.6321	Dielectric Breakdown Voltage	X		
830.7000	pH	X		
830.7050	UV/ Visible Absorption			
830.7100	Viscosity	X		
830.7200	Melting Point			
830.7220	Boiling Point			
830.7300	Density	X		
830.7370	Dissociation Constant			
830.7550	Partition Coefficient			
830.7840	Water Solubility			
830.7950	Vapor Pressure			

Grayed out = data not required

\*May not be included with initial application

## A532 – Acute Toxicity Requirements

- Must use cite-all data citation for studies listed below

Guideline No.	Acute toxicity (6 pack) Study Title	Cite All	Selective
830.1100	Acute Oral (LD50)	X	
830.1200	Acute Dermal (LD50)	X	
830.1300	Acute Inhalation (LC50)	X	
830.2400	Acute Eye Irritation	X	
830.2500	Acute Dermal Irritation	X	
830.2600	Dermal Sensitization	X	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

March 15, 2012

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

OPP Decision Number: D-461239  
EPA File Symbol or Registration Number: 83525-L  
Product Name: WEGOCIDE THPS 75  
EPA Application Receipt Date: 08-Feb-2012  
EPA Waiver Request Receipt Date: 08-Feb-2012  
EPA Company Number: 83525  
Company Name: WEGO CHEMICAL & MINERAL CORP.

BERT ESHAGHPOUR  
WEGO CHEMICAL & MINERAL CORP.  
239 GREAT NECK ROAD  
GREAT NECK, NY 11021-

SUBJECT: Approval of Waiver Request

Dear Registrant:

The Office of Pesticide Programs has approved your request for 75% waiver of the pesticide registration fee associated with the action referenced above. The decision review period for this action will begin on the date of this letter.

The Action has been identified as Action Code: A560

NEW MANUFACTURING USE PRODUCT;OLD AI;SELECTIVE CITATION;

If you have any questions, please contact Ms. ShaRon Carlisle, at (703) 308-6427.

Sincerely,

A handwritten signature in cursive script, appearing to read "Oscar Morales".

Oscar Morales, Director  
Information Technology & Resources Management Division  
Office of Pesticide Programs

DECISION PKG. NO. 461239  
SUBMISSION BAR CODE # 911338

SUBM. DUE DATE 6/30/12  
REVIEWER K.L.

CODING FORM FOR APPLICATIONS FOR REGISTRATION/AMENDME

FILE SYMBOL/REG NO. 83525-L PM 33 ACTION CODE 539 ~~ACD~~ PRIA  
DESCRIPTOR New Registration FOPA NFOPA

[ ] CHILD RESISTANT PACKAGING: [ ] REQUIRED [ ] NOT REQUIRED  
REGISTRATION TYPE: [ ] CONDITIONAL [ ] UNCONDITIONAL [ ] RESTRICTED US

DATE ON APPLICATION

EPA RECEIVE DATE

PM RECEIVE DATE

2/4/12

2/8/12

2/8/12

METHOD OF SUPPORT

FORMULATORS EXEMPTION

[ ] CITE-ALL [ ] SELECTIVE  
[ ] NOT SUBMITTED [ ] N/A

[ ] SUBMITTED [ ] NOT SUBMITTED  
[ ] N/A

REVIEW(S) REQUESTED

DATA  
PACK #

DATE  
SENT

DUE  
DATE

DATE  
RETURNED

CHEMISTRY [ ] [ ] [ ] [ ]

EFFICACY [ ] [ ] [ ] [ ]

ACUTE TOX. [ ] [ ] [ ] [ ]

RASSE TOX. [ ] [ ] [ ] [ ]

ENVIRON. FATE [ ] [ ] [ ] [ ]

FISH/WILDLIFE [ ] [ ] [ ] [ ]

OTHER: [ ] [ ] [ ] [ ]

STATUS \_\_\_\_\_

RESPONSE CODE \_\_\_\_\_

RESPONSE DATE \_\_\_\_\_

# Material Sent for Data Extraction

Reg # 83525-5

Description: New Registration

☐ Material(s) Sent to Data Extraction Contractors:

☐ New Stamped Label Dated \_\_\_\_\_

☐ Notification Dated \_\_\_\_\_

☐ New CSF(s) Dated \_\_\_\_\_

☒ Other: Rescan the label dated June 18, 2012

☐ Decision #: 461239

☒ Other Action/Comments: The labeling that

appears on PPLS is illegible. Please rescan  
the product labeling dated June 18, 2012.

Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer: Karen Leary

Phone: 308-6237 Division: AD

Date: 11/20/12



U.S. ENVIRONMENTAL PROTECTION  
AGENCY

Office of Pesticide Programs  
Antimicrobials Division (7510C)  
1200 Pennsylvania Avenue NW  
Washington, D.C. 20460

EPA P-

Number

83525-5

Date of

Issuance:

JUN 18 2012

Term of Issuance:

Unconditional

Name of Pesticide Product:

Wegocide THPS 75

NOTICE OF PESTICIDE:

☒ Registration  
☐ Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Wego Chemical & Mineral Corp.  
239 Great Neck Road  
Great Neck, NJ 11021

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA Section 3(c)(7)(A) provided that you:

1. Submit and/or cite all the data required for registration of your product under FIFRA Section 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit required by registration review under FIFRA Section 3(g).
2. Make the following labeling changes:
  - a. Revise the EPA Registration Number to read, EPA Reg. No. 83525-5
  - b. Place the appropriate EPA Establishment Number on the product labeling.

Signature of Approving Official:

Marshall Swindell, Product Manager, Team 33  
Regulatory Management Branch I, Antimicrobials Division

Date:

JUN 18 2012



Page 2

EPA Reg. No. 83525-5

3. Submit three copies of the final printed label prior to releasing this product for sale.

The Confidential Statement of Formula dated February 4<sup>th</sup>, 2012, is acceptable.

A stamped copy of the label is enclosed for your records.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec.6(e). Your release for shipment of the product constitutes acceptance of these conditions.

Sincerely,



Marshall Swindell  
Product Manager 33  
Regulatory Management Branch I  
Antimicrobial Division(7509C)

# WEGOCIDE THPS 75

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

JULY 18 2010  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 83525-5

FIRST AID	
If in Eyes	<ul style="list-style-type: none"> <li>•Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>•Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>•Call a poison control center or doctor for treatment advice.</li> </ul>
If Swallowed	<ul style="list-style-type: none"> <li>•Call a poison control center or doctor immediately for treatment advice.</li> <li>•Have person sip a glass of water if able to swallow.</li> <li>•Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>•Do not give anything by mouth to an unconscious person.</li> </ul>
If Inhaled	<ul style="list-style-type: none"> <li>•Move person to fresh air.</li> <li>•If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.</li> <li>•Call a poison control center for further treatment advice.</li> </ul>
If on Skin or Clothing	<ul style="list-style-type: none"> <li>•Take off contaminated clothing.</li> <li>•Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>•Call a poison control center or doctor for treatment advice.</li> </ul>
<p>Have product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information call the National Pesticides Information Center at 1-800-858-7378, 9:30 AM to 7:30 PM, Eastern time (ET), seven days a week. During other times, call the poison control center at 1-800-222-1222.</p> <p><b>Note to physician:</b> Probable mucosal damage may contraindicate the use of gastric lavage.</p>	

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**DANGER:** Corrosive. Causes irreversible eye damage. May be fatal if swallowed. Harmful if inhaled. Harmful if absorbed through skin. Do not get in eyes, on skin or on clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Avoid breathing vapor or spray. Wear long-sleeved shirt and pants or coveralls, goggles or face shield and chemical-resistant gloves when handling. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

### ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

Used in air conditioner/refrigeration condensate water systems, air washer systems, recirculating commercial/industrial water cooling systems, heat exchanger water systems, paper and paperboard manufacturing, industrial processing water, industrial fresh water systems, industrial wastewater systems, fire protection systems, service water and auxiliary systems, solutions/emulsions, oil field operations and systems, and drilling muds/packer fluids. **Not for use in paint.**

## FOR INDUSTRIAL USE ONLY

### ACTIVE INGREDIENT:

Tetrakis (hydroxymethyl) phosphonium sulfate.....75%  
OTHER INGREDIENTS:.....25%  
TOTAL:.....100%

EPA Reg. No. xxxxxx-xx

EPA Est. xxx-xxxx-xxx

## KEEP OUT OF REACH OF CHILDREN DANGER

In case of emergency, call ChemTel at 1-800-255-3924

Produced For – When Produced By Contract Manufacturer:



## WEGO CHEMICAL & MINERAL CORP.

239 Great Neck Road • Great Neck, New York 11021

Tel: +1 516 487 3510 • Fax: +1 516 487 3794

sales@wegochem.com • www.wegochem.com

## NET CONTENTS: As Marked on Container

**Notice:** Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk and/or handling of this material, when such use and/or handling is contrary to label directions.

## DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

*Manufacturing*  
**For formulatory use only.**

Formulators are responsible for providing data to support registration of products formulated from this active ingredient. Formulators are responsible for retaining their own licenses for any uses or formulations for this material covered by patents. This label is not to be taken as license to operate under or recommendation to infringe any patent.

## STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**Storage:** Store this product in a cool, dry area away from direct sunlight and heat to avoid deterioration. In case of a spill, flood the area with large quantities of water.

**Pesticide Disposal:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**Container Handling and Disposal: Nonrefillable container.** Do not reuse or refill this container. Triple rinse promptly after emptying. Triple rinse as follows: Fill the container ¼ full with water and reclose the container. Agitate vigorously, and dispose of rinsate consistent with pesticide disposal instructions. Repeat two more times. Then offer container for recycling or reconditioning if appropriate or puncture and dispose in sanitary landfill or incineration. If not triple rinsed, these containers are acute hazardous wastes and must be disposed in accordance with local, state and federal regulations.

**Container Handling and Disposal: Refillable container.** Refill this container with THPS only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, triple rinse as follows: Fill the container ¼ full with water and reclose the container. Agitate vigorously, and dispose of rinsate consistent with pesticide disposal instructions. Repeat two more times. Then offer container for recycling or reconditioning if appropriate or puncture and dispose in sanitary landfill or incineration. If not triple rinsed, these containers are acute hazardous wastes and must be disposed in accordance with local, state and federal regulations.

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 83585

# WEGOCIDE THPS 75

## FIRST AID

If in Eyes	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
If Swallowed	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
If Inhaled	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.</li> <li>• Call a poison control center for further treatment advice.</li> </ul>
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### ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to waste systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

Used in air conditioner/refrigeration condensate water systems, air washer systems, recirculating commercial/industrial water cooling systems, heat exchanger water systems, paper and paperboard manufacturing, industrial processing water, industrial fresh water systems, industrial wastewater systems, fire protection systems, service water and auxiliary systems, solutions/emulsions, oil field operations and systems, and drilling muds/packer fluids. **Not for use in paint.**

## FOR INDUSTRIAL USE ONLY

### ACTIVE INGREDIENT:

Tetrakis (hydroxymethyl) phosphonium sulfate.....75%

OTHER INGREDIENTS:.....25%

TOTAL:.....100%

EPA Reg. No. XXXXX-XX

EPA Est. XXX-XXXX-XXX

## KEEP OUT OF REACH OF CHILDREN

## DANGER

In case of emergency, call ChemTel at 1-800-255-3924

Produced For – When Produced By Contract Manufacturer:



## WEGO CHEMICAL & MINERAL CORP.

239 Great Neck Road • Great Neck, New York 11021

Tel: +1 516 487 3510 • Fax: +1 516 487 3794

sales@wegochem.com • www.wegochem.com

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Formulators are responsible for providing data to support registration of products formulated from this active ingredient. Formulators are responsible for retaining their own licenses for any uses or formulations for this material covered by patents. This label is not to be taken as license to operate under or recommendation to infringe any patent.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



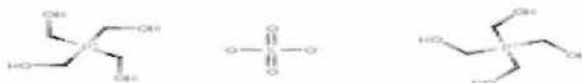
United States  
Environmental Protection  
Agency

Office of Pesticide Programs

**Antimicrobials Division (AD)**

May 07, 2012.

DP BARCODE: D399640.  
MRID: 487426-00, 487426-01 & 487401-01.  
SUBJECT: **Wegocide THPS 75.**  
REG. NO. OR FILE SYMBOL: 83525-L.  
DOCUMENT TYPE: Product Chemistry Review  
Manufacturing-use ☒ OR End - Use Product ☐  
INGREDIENT (PC Code)  
Tetrakis (hydroxymethyl) phosphonium sulphate (THPS) (129058)



CAS Number: 55566-30-8  
TEST LAB: Shanghai Research Institute of Chemical Industry Testing Centre.  
SUBMITTER: Wego Chemical & Mineral Corp.  
GUIDELINE: OPPTS Guidelines tables A & B.  
COMMODITIES: Formulation  
REVIEWER: Salvador Rodriguez.  
ORGANIZATION: AD.  
APPROVER: Karen P. Hicks.  
APPROVED DATE: 05/07/12.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



United States  
Environmental Protection  
Agency

Office of Pesticide Programs

**Antimicrobials Division (AD)**

May 07, 2012.

**MEMORANDUM**

**Subject:** Product Chemistry Review for EPA Reg # 83525-L

**Product name:** **Wegocide THPS 75.**

**DP#:** 399640.

**From:** Salvador Rodriguez, Chemist  
Product Science Branch, CT Team  
Antimicrobials Division (7510P)

**Thru:** Karen P. Hicks, CT Team Leader  
Product Science Branch  
Antimicrobials Division (7510P)

**To:** Marshall Swindell / Karen Leavy.  
PM Team 33  
Antimicrobials Division (7510P)

**APPLICANT:** Wego Chemical & Mineral Corp.

**Action code:** A532

**Due date:** 06/30/12.

**Product Formulation**  
**Active Ingredient**

**% by wt**

Tetrakis (hydroxymethyl) phosphonium sulphate.....75

A handwritten signature in black ink, appearing to be 'K. Hicks' or similar, with a large loop at the top.

## BACKGROUND:

On behalf of the registrant, Wego Chemical and Mineral, the consultant, Laird's Regulatory Consultants, Inc., has submitted a me-too application to support the registration of the bacteriocide integrated manufactured-use product **Wegocide THPS 25**. The product chemistry reviewer has reviewed the following documents:

- A letter, dated 02/04/12.
- Certification with respect to citation of data, pin punched 02/13/12.
- Confidential Statement of Formula, dated 02/04/12, for the basic formulation.
- Draft label, pin punched 02/08/12.
- OPPTS 830 Guidelines tables A & B. MRID #'s 487426-01.
- A courtesy copy of the OPPTS 830.1700 "Preliminary Analysis"
- Confidential Statement of Formula, dated 12/06/2000, for the me-too basic formulation.

## FINDINGS:

1. The CSF, dated 02/04/12, for the basic formulation is revised.
2. The CSF and the label have the same nominal.
3. All certified limits meet the EPA standard certified limits
4. The OPPTS Guidelines Series 830 Group A product chemistry data requirements applicable to manufactured-use products have been met. MRID #'s 487401-01, 487426-01, 427653-03 & 422363-02.
5. The OPPTS guidelines series 830 Group B product chemistry data requirements applicable to manufactured-use products have been met. MRID #'s 487426-01, 427653-03 & 422363-02.
7. The registrant indicated that these courtesy five pilot-scale batches for the product **Wegocide THPS 75** were selected for performing the Preliminary Analysis Study. Using the Enforcement Analytical Method, samples were analyzed in duplicate and the average of the two readings was used to express the weight % active ingredient (AI) in each sample. The results are the following:

<b>Lot #</b>	<b>Average content (%)</b>
20110803	75.16
20110806	75.35
20110809	75.42
20110812	75.47
20110815	75.27

#### **CONCLUSIONS:**

Product Science Branch of Antimicrobials Division finds the proposed CSF for the basic formulation, dated 02/04/12, for the EPARN 83525-L, and the OPPTS Guidelines Group A and OPPTS Guidelines Group B to be acceptable. The results of the five batch analysis OPPTS 830.1700 are within the EPA standards certified limits.

#### **RECOMENDATIONS:**

The EPA suggests to formatting submitted documents using PR Notice 86-5.



**Table B:**  
**Physical and Chemical Characteristics (Series 830, Group B)**

Physical/Chemical Properties*	Acceptance of Data	Value or Qualitative Description	MRID No.
830.6302 Color	A	The color of the product is white to light yellow.	487426-01
830.6303 Physical State	A	The product is a solid (i.e., crystals).	487426-01
830.6304 Odor	A	The product has a bromine-like odor.	487426-01
830.6313 Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	NR	<i>[Not required for manufacturing-use products.]</i>	
830.6314 Oxidation/Reduction; Chemical Incompatibility	A	The product does not contain an oxidizing or reducing agent or functional group of significant activity.	427653-01
830.6315 Flammability/Flame Extension	A		487426-01
830.6316 Explodability	A	The product is not considered to present a danger of explosion under the test conditions.	427653-02 487401-01
830.6317 Storage Stability	W	This product is under the RED protocol	
830.6319 Miscibility <sup>1</sup>			
	A	This submission is under the RED protocol	487401-01
830.6320 Corrosion Characteristics	W	This submission is under the RED protocol	
830.6321 Dielectric Breakdown Voltage	NA	<i>[Not required for manufacturing-use products.]</i>	
830.7000 pH <sup>2</sup>	A	The pH of the product was reported to be 4-5.5 (1% solution in water).	487401-01
830.7050 UV/Visible Absorption	NA	<i>[Not required for manufacturing-use products.]</i>	
830.7100 Viscosity	A	The product is a solid.	487401-01
830.7200 Melting Point/Melting Range	NA	<i>[Not required for manufacturing-use products.]</i>	
830.7220 Boiling Point/Boiling Range	NA	<i>[Not required for manufacturing-use products.]</i>	
830.7300 Density/Relative Density/Bulk Density	A	The density of the product was reported to be (1.00- 1.50) g/mL at 20°C.	487401-01



Physical/Chemical Properties*	Acceptance of Data	Value or Qualitative Description	MRID No.
830.7370 Dissociation Constants in Water	NA	<i>[Not required for manufacturing-use products.]</i>	
830.7550/830.7560/830.7570 Partition Coefficient	NA	<i>[Not required for manufacturing-use products.]</i>	
830.7840/830.7860 Water Solubility	NA	<i>[Not required for manufacturing-use products.]</i>	
830.7950 Vapor Pressure	NA	<i>[Not required for manufacturing-use products.]</i>	

Explanation: A=acceptable; N=not acceptable (i.e., item was submitted but is not acceptable); NA=technically not applicable (i.e., not required); G=data gap (i.e., item was not submitted but is required); U=requires upgrading (i.e., item is unacceptable but upgradeable); W=waived; E=EPA estimate.

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\* Provide brief description, e.g., color – yellow or property value, e.g., density 1.25 g/cc. Unless otherwise indicated, the property should be at 25°C.

<sup>1</sup>If product is an emulsifiable liquid

<sup>2</sup>If product is dispersible with water

# DATA PACKAGE BEAN SHEET

Date: 08-Mar-2012

Page 1 of 2

Decision #: 461239

DP #: (399640)

PRIA

Parent DP #:

Submission #: 911338

E-Sub #:

## \*\*\* Registration Information \*\*\*

Registration: 83525-L - WEGOCIDE THPS 75

Company: 83525 - WEGO CHEMICAL & MINERAL CORP.

Risk Manager: RM 33 - Marshall Swindell - (703) 308-6341 Room# PY1 S-8828

Risk Manager Reviewer: Karen Leavy KLEAVY

Sent Date:

Calculated Due Date: 30-Jun-2012

Edited Due Date:

Type of Registration: Product Registration - Section 3

Action Desc: (A532) UNREGISTERED SOURCE OF ACTIVE INGREDIENT;NEW PRODUCT;CITE-ALL DA

Ingredients: 129058, Tetrakis(hydroxymethyl)phosphonium sulphate (THPS)(75%)

## \*\*\* Data Package Information \*\*\*

Expedite: ☐ Yes ☒ No

Date Sent: 08-Mar-2012

Due Back:

DP Ingredient: 129058, Tetrakis(hydroxymethyl)phosphonium sulphate (THPS)

DP Title:

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #:

### Assigned To

### Date In

### Date Out

Organization: AD / PSB

3/8/12

Last Possible Science Due Date: 31-May-2012

Team Name: CTT

3/8/12

05/07/12

Science Due Date: 5/23/12

Reviewer Name:

Salvador

3/8/12

05/07/12

Sub Data Package Due Date: 6/6/12

Contractor Name:

## \*\*\* Studies Sent for Review \*\*\*

Printed on Page 2

## \*\*\* Additional Data Package for this Decision \*\*\*

No Additional Data Packages

## \*\*\* Data Package Instructions \*\*\*

Please review the attached studies (MRID 487426-01 and 487401-01) in support of this application. A Label and CSF is included.

PRIA, ACTION CODE A532, ADMIN DUE DATE 6/30/12, CTT DUE DATE 5/30/12.

RECEIVED  
3/8/12



United States  
Environmental Protection Agency  
Washington, DC 20460  
**Formulator's Exemption Statement**  
(40 CFR 152.85)

Applicant's Name and Address  Wego Chemical and mineral 239 Great Neck Road Great Neck, New York 11021	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="padding: 2px 5px;">EPA File Symbol/Registration Number 83525 -</td> </tr> <tr> <td style="padding: 2px 5px;">Product Name WEGOCIDE THPS <b>75</b></td> </tr> <tr> <td style="padding: 2px 5px;">Date of Confidential Statement of Formula (EPA Form 8570-4) 02/04/2012</td> </tr> </table>	EPA File Symbol/Registration Number 83525 -	Product Name WEGOCIDE THPS <b>75</b>	Date of Confidential Statement of Formula (EPA Form 8570-4) 02/04/2012
EPA File Symbol/Registration Number 83525 -				
Product Name WEGOCIDE THPS <b>75</b>				
Date of Confidential Statement of Formula (EPA Form 8570-4) 02/04/2012				

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Tetrakis (hydroxymethyl) phosphonium sulfate, (THPS)

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
Tetrakis (hydroxymethyl) phosphonium sulfate, (THPS)	THPS	N / A
Signature 	Name and Title Cuthbert Fedrick/Regulatory Manager	Date 02/04/2012

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 - EPA  
Copy 2 - Applicant copy



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**1200 Pennsylvania Avenue, N.W.**  
**WASHINGTON, D.C. 20460**

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

**Certification with Respect to Citation of Data**

Applicant's/Registrant's Name, Address, and Telephone Number Wego Chemical & Mineral Corp., 239 Great Neck Road, Great Neck, NY 11021 516-487-3510	EPA Registration Number/File Symbol 83525-
Active Ingredient(s) and/or representative test compound(s) Tetrakis(hydroxymethyl)phosphonium sulfate	Date June 14, 2011
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158)	Product Name Wegocide THPS 75

**NOTE:** If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

**SECTION I: METHOD OF DATA SUPPORT (Check one method only)**

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

**SECTION II: GENERAL OFFER TO PAY**

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

**SECTION III: CERTIFICATION**

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature <i>Kimberly Morgan</i>	Date June 14, 2011	Typed or Printed Name and Title Kimberly Morgan, Product Manager
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
1200 Pennsylvania Avenue, N.W.  
WASHINGTON, D.C. 20460

Form Approved OMB Nos. 2070-0060; 2070-0057;  
2070-0107; 2070-0122; 2070-0164

**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date May 22, 2012	EPA Reg No./File Symbol 83525 - L	Page 1 of 5
Applicant's/Registrant's Name & Address Wego Chemical & Mineral Corp., 239 Great Neck Road Great Neck, New York 11021	Product WEGOCIDE THPS	GENERIC

Ingredient Tetrakis (hydroxymethyl) phosphonium Sulfate (THPS)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Chemical Identity	Attached	Wego Chemical & Mineral Corp.	Pending	
830.1600	Starting material & Manufacturing Process	Attached	Wego Chemical & Mineral Corp.	Pending	
830.1670	Discussion of formation of Impurities	Attached	Wego Chemical & Mineral Corp.	Pending	
830.1700	Preliminary Analysis	Attached	Wego Chemical & Mineral Corp.	Pending	
830.1750	Certified Limits	Attached	Wego Chemical & Mineral Corp.	Pending	
830.1800	Enforcement Analytical Method	Attached	Wego Chemical & Mineral Corp.	Pending	
830.6302	Color	Attached	Wego Chemical & Mineral Corp.	Pending	
830.6303	Physical State	Attached	Wego Chemical & Mineral Corp.	Pending	
830.6304	Odor	Attached	Wego Chemical & Mineral Corp.	Pending	
830.7200	Melting Point	N / A			
830.7220	Boiling Point	Attached	Wego Chemical & Mineral Corp.	Pending	
830.7300	density / bulk Density	Attached	Wego Chemical & Mineral Corp.	Pending	
830.7840	Solubility (column Elution)	Attached	Wego Chemical & Mineral Corp.	Pending	
830.7860	Solubility (generation Column)	Attached	Wego Chemical & Mineral Corp.	Pending	
830.7950	Vapor Pressure	Attached	Wego Chemical & Mineral Corp.	Pending	

Signature 	Name and Title Olivia D. Laird for Kimberly Morgan	Date 05 / 22 / 2012
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
1200 Pennsylvania Avenue, N.W.  
WASHINGTON, D.C. 20460

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DATA MATRIX

Date	May 22, 2012	EPA Reg No./File Symbol	83525 - L	Page	2 of 5
Applicant's/Registrant's Name & Address	Wego Chemical & Mineral Corp., 239 Great Neck Road Great Neck, New York 11021		Product	WEGOCIDE THPS GENERIC	

Ingredient Tetrakis (hydroxymethyl) phosphonium Sulfate (THPS)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7370	Dissociation Constant	Attached	Wego Chemical & Mineral Corp	Pending	
830.7570	Octanol / Water Partition Coefficient.	Attached	Wego Chemical & Mineral Corp	Pending	
830.7000	pH	Attached	Wego Chemical & Mineral Corp	Pending	
830.6313	Stability	Attached	Wego Chemical & Mineral Corp	Pending	
830.6314	Oxidation / Reduction	Attached	Wego Chemical & Mineral Corp	Pending	
830.6315	Flammability	Attached	Wego Chemical & Mineral Corp	Pending	
830.6316	Explosibility	Attached	Wego Chemical & Mineral Corp	Pending	
830.6317	Storage Stability	Attached	Wego Chemical & Mineral Corp	Pending	
830.7100	Viscosity	N / A			
830.6319	Micibility	N / A			
830.6320	Corrosion Characteristic	attached	Wego Chemical & Mineral Corp	Pending	
830.6321	Dielectric Breakdown Voltage	Attached	Wego Chemical & Mineral Corp	Pending	
158.340 GL REF.	TOXICITY DATA REQUIREMENTS				
81-1	Acute Oral Toxicity-rat	Attached	Wego Chemical & Mineral Corp	Pending	
81-2	Acute Dermal Toxicity	Attached	Wego Chemical & Mineral Corp	Pending	

Signature

Name and Title Olivia D. Laird for Kimberly Morgan

Date  
05/22/2012





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
1200 Pennsylvania Avenue, N.W.  
WASHINGTON, D.C. 20460

Form Approved OMB Nos. 2070-0060; 2070-0057;  
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DATA MATRIX

Date May 22, 2012	EPA Reg No./File Symbol 83525 - L	Page 3 of 5
Applicant's/Registrant's Name & Address Wego Chemical & Mineral Corp, 239 Great Neck Road Great Neck, New York 11021	Product WEGOCIDE THPS	GENERIC

Ingredient Tetrakis (hydroxymethyl) phosphonium Sulfate (THPS)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1200	Acute dermal Irritation Rabbit	Cite-All	Cite-All		
830.1300	Acute Inhalation Toxicity-rat	Cite-All	Cite-All		
830.2400	Primary Eye Irritation - Rabbbit	Cite-All	Cite-All		
830.2500	Primary Dermal Irritation	Cite-All	Cite-All		
830.2600	Dermal Sensitization G. Pigs	Cite-All	Cite-All		
	ENVIRONMENTAL CHEMISTRY				
	Environmental Fate in Water Applications	Cite-All	Cite-All		
	CHRONIC TOXICOLOGY				
	13 Week Oral (Gavage) - Rat	Cite-All	Cite-All		
	Oral (Gavage) Range Finding-Pregnant Rat	Cite-All	Cite-All		
	Reverse Mutation Assay-(s. typh & e.coli)	Cite-All	Cite-All		
	Chromosome Aberrations-Chinese Hamster	Cite-All	Cite-All		
	Add. 90day Dermal Waiver Request	Cite-All	Cite-All		
	Oral Teratology Study - Rabbit	Cite-All	Cite-All		
	Dominant Lethal Study - Rat				

Signature 	Name and Title Olivia D. Laird for Kimberly Morgan	Date 5/22/2012
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
1200 Pennsylvania Avenue, N.W.  
WASHINGTON, D.C. 20460

Form Approved OMB Nos. 2070-0060; 2070-0057;  
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DATA MATRIX

Date May 22, 2012	EPA Reg No./File Symbol 83525 - L	Page 4 of 5
Applicant's/Registrant's Name & Address Wego Chemical & Mineral Corp, 239 Great Neck Road Great Neck, New York 11021	Product WEGOCIDE THPS	GENERIC

Ingredient Tetrakis (hydroxymethyl) phosphonium Sulfate (THPS)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	Oral Teratology - Rat	Cite-All	Cite-All		
	Tox & Carcinogenesis-Rats & B6C3F1 Mice	Cite-All	Cite-All		
	Oral Range Finding - Pregnant Rabbit	Cite-All	Cite-All		
	Chromosomal Aberrations-Chinese Hamster	Cite-All	Cite-All		
	Reverse Mutagen in Four Histidine	Cite-All	Cite-All		
	Mutagenic Activity - Salmonella Typhimurium	Cite-All	Cite-All		
	Genotoxicity in an unscheduled DNA synth.	Cite-All	Cite-All		
	Mutation at the (TK) Locus of Mouse Lymph.	Cite-All	Cite-All		
	28-day Dose Range Finding - Rat	Cite-All	Cite-All		
	Mouse Lymphoma Mutation Assay	Cite-All	Cite-All		
	FISH & WILDLIFE TOXICOLOGY				
	THPS Determination-Selenastrum Capricor.	Cite-All	Cite-All		
	Acute Oral Toxicity - Mallard Duck	Cite-All	Cite-All		
	Acute Toxicity to Daphnia Magna	Cite-All	Cite-All		
	21 Day Juvenile Production Test - Daphnia	Cite-All	Cite-All		

Signature 	Name and Title Olivia D. Laird FOR Kimberly Morgan	Date 5/22/2012
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
1200 Pennsylvania Avenue, N.W.  
WASHINGTON, D.C. 20460

Form Approved OMB Nos. 2070-0060; 2070-0057;  
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DATA MATRIX

Date May 22, 2012	EPA Reg No./File Symbol 83525 - L	Page 5 of 5
Applicant's/Registrant's Name & Address Wego Chemical & Mineral Corp, 239 Great Neck Road Great Neck, New York 11021	Product WEGOCIDE THPS	GENERIC

Ingredient Tetrakis (hydroxymethyl) phosphonium Sulfate (THPS)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	Dietary Toxicity (LC50) - Mallard Duck	Cite-All	Cite-All		
	Acute Toxicity - Bluegill Sunfish	Cite-All	Cite-All		
	Acute Toxicity - Rainbow Trout	Cite-All	Cite-All		
	Dietary Toxicity (LC50) - Bobwhite Quail	Cite-All	Cite-All		
	Acute Toxicity - Sheepshead Minnows	Cite-All	Cite-All		
	(THPO) Acute Toxicity - Daphnia Magna	Cite-All	Cite-All		
	ACUTE TOXICOLOGY				
	Single Dose Oral Toxicity/LD50 in Rats	Cite-All	Cite-All		
	Magnusson & Kligman Maxim. - Guinea Pig	Cite-All	Cite-All		
	Assessment of Respiratory Tract-Mouse	Cite-All	Cite-All		

Signature

*Olivia D. Laird*

Name and Title

Olivia D. Laird FOR Kimberly Morgan

Date

5/22/2012



United States  
Environmental Protection Agency  
Washington, DC 20460

☒ Registration  
☐ Amendment  
☐ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number <b>83525-L</b>	2. EPA Product Manager <b>Marshall Swindell</b>	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Wegocide THPS <b>75</b>	PM# <b>33</b>	
5. Name and Address of Applicant (Include ZIP Code) Wego Chemical & Mineral Corp. 239 Great Neck Road Great Neck, NY 11021 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. <b>33677-3</b> Product Name <b>Tolcide PS75</b>	

## Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
* Certification must be submitted				Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1400 Kg, 1300 Kg, 273 Kg 250 Kg		5. Location of Label Directions <input checked="" type="checkbox"/> Lower right-hand corner	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Kimberly Morgan		Title Product Manager		Telephone No. (Include Area Code) 516-487-3510 x 114	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received  <b>(Stamped)</b>
2. Signature 		3. Title Product Manager			
4. Typed Name Kimberly Morgan		5. Date <b>02/04/2012</b>			

# Laird's Regulatory Consultants, Inc.

Over 32 years of EPA, FDA, & State Pesticide Product Regulation & Consultation

**February 4, 2012**

**U.S. Environmental Protection Agency (EPA)**

**ATTN: Mr. Marshall Swindell, PM 33**

**Office of Pesticide Programs (7501P)**

**Document Processing Desk (MFEE)**

**Ariel Rios Building**

**1200 Pennsylvania Ave., N.W.**

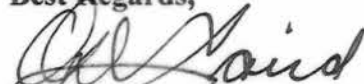
**Washington, D.C. 20460-0001**

**SUBJECT: WEGOCIDE THPS 75**

**Application for registration for a me-to product**

Appended hereto is an application for a New product; although this active ingredient is purchased from an unregistered source the product is identical or substantially similar in composition and use to a registered product and registered active ingredient we have chosen to use the cite-all data selective citation where we have submitted the product chemistry data to support this registration.

Best Regards,



Olivia D. Laird, Agent

## **TABLE OF CONTENT**

- 1. Transmittal Document**
- 2. Transmittal letter**
- 3. Application form (8570-1)**
- 4. Five (5) copies of the revised label**
- 5. Letter of Authorization**
- 6. Five copies of the proposed label**
- 7. Certification With Respect to Citation of Data**
- 8. List of companies notified from Data Submitters list**
- 9. Formulator's Exemption**
- 10. Data Matrix**



## WEGO CHEMICAL & MINERAL CORP.

239 Great Neck Road • Great Neck, New York 11021  
Tel: +1 516 487 3510 • Fax: +1 516 487 3794  
sales@wegochem.com • www.wegochem.com

Document Processing Desk  
Office of Pesticides Program  
Environmental Protection Agency  
One Potomac Yard  
277 South Crystal Drive  
Arlington, Virginia 22202

June 14, 2011

**SUBJECT: Wegocide THPS<sup>75</sup>®**  
**Tetrakis (hydroxymethyl) phosphonium sulfate 75%**

**To Whom It May Concern:**

By this letter, I Kimberly Morgan hereby authorize Olivia D. Laird, doing business as:

**LAIRD'S REGULATORY CONSULTANTS, INC.**  
17804 Braemar Place  
Estates at Shenstone Farms  
Leesburg, Virginia 20175-7046

**PHONE: (703) 669-0509**

**Email Address: Laird1olivia@aol.com or Lairdregulatoryconsult@verizon.net**  
**Website: www.lairdreg.com**

To deal with Environmental Protection Agency on behalf of Wego Chemical & Mineral Corp. in all matters pursuant to obtaining registration of the product(s) referenced above.

This authorization is effective as of this date and will remain in effect until further notice. Should you have questions or concerns please don't hesitate to contact us.

Sincerely,

  
Kimberly Morgan  
Product Manager

## TRANSMITTAL DOCUMENT

### 1. NAME & ADDRESS OF SUBMITTER AND SPONSOR

Submitter:  
Laird's Regulatory Consultants, Inc.  
Shenstone Estates  
17804 Braemar Place  
Leesburg, VA 20175-7046

Sponsor:  
  
Wego Chemical and Mineral  
239 Great Neck Road  
Great Neck, New York 11021

### 2. REGULATORY ACTION TO BE TAKEN

Application for Registration of a Me-too Product

EPA File Symbol/Reg. No.: 83525 -

Product Name: WEGOCIDE THPS 75

#### TRANSMITTAL DATE

February 4, 2012

#### LIST OF SUBMITTED STUDIES

Volume 1: Administrative Materials  
Volume 2: Chemistry

Company Official: Cuthbert Frederick /Regulatory manager

Company Contact: Olivia D. Laird Olivia D. Laird  
for Cuthbert Frederick

Phone: (703) 669-0509

VOLUME 1 of 2  
Administrative

## TRANSMITTAL DOCUMENT

### 1. NAME & ADDRESS OF SUBMITTER AND SPONSOR

**Submitter:**

Laird's Regulatory Consultants, Inc.  
Shenstone Estates  
17804 Braemar Place  
Leesburg, VA 20175-7046

**Sponsor:**

Wego Chemical and Mineral  
239 Great Neck Road  
Great Neck, New York 11021

### 2. REGULATORY ACTION TO BE TAKEN

Application for Registration of a Me-too Product

EPA File Symbol/Reg. No.: 83525 -

Product Name: WEGOCIDE THPS **75**

#### TRANSMITTAL DATE

February 4, 2012

#### LIST OF SUBMITTED STUDIES

Volume 1: Administrative Materials

Volume 2: Chemistry

Company Official: Cuthbert Frederick /Regulatory manager

Company Contact:  Olivia D. Laird  
for Cuthbert Frederick

Phone: (703) 669-0509

VOLUME 1 of 2  
Administrative

## TRANSMITTAL DOCUMENT

### 1. NAME & ADDRESS OF SUBMITTER AND SPONSOR

**Submitter:**

Laird's Regulatory Consultants, Inc.  
Shenstone Estates  
17804 Braemar Place  
Leesburg, VA 20175-7046

**Sponsor:**

Wego Chemical and Mineral  
239 Great Neck Road  
Great Neck, New York 11021

### 2. REGULATORY ACTION TO BE TAKEN

Application for Registration of a Me-too Product

EPA File Symbol/Reg. No.: 83525 -

Product Name: WEGOCIDE THPS **75**

TRANSMITTAL DATE

February 4, 2012

LIST OF SUBMITTED STUDIES

Volume 1: Administrative Materials

Volume 2: Chemistry

Company Official: Cuthbert Frederick /Regulatory manager

Company Contact:  Olivia D. Laird  
for Cuthbert Frederick

Phone: (703) 669-0509

VOLUME 1 of 2  
Administrative



TRANSMITTAL DOCUMENT

48742600

1. NAME & ADDRESS OF SUBMITTER AND SPONSOR

Submitter:

Laird's Regulatory Consultants, Inc.  
Shenstone Estates  
17804 Braemar Place  
Leesburg, VA 20175-7046

Sponsor:

Wego Chemical and Mineral  
239 Great Neck Road  
Great Neck, New York 11021

2. REGULATORY ACTION TO BE TAKEN

Application for Registration of a Me-too Product  
Additional Chemistry information being submitted

EPA File Symbol/Reg. No.: 83525 -

Product Name: WEGOCIDE THPS

TRANSMITTAL DATE

February 8, 2012

LIST OF SUBMITTED STUDIES

Volume 1: Administrative Materials

48742601 Volume 2: Chemistry

Company Official: Cuthbert Frederick /Regulatory manager

Company Contact: 

Olivia D. Laird  
for Cuthbert Frederick

Phone: (703) 669-0509

VOLUME 2 of 2  
Additional Chemistry Data



Figure 1 illustrates the decomposition of a 2D grid into four quadrants. The grid is labeled with 'C' and 'E' in a pattern. The quadrants are labeled 'C', 'E', 'C', and 'E' from top-left to bottom-right. The grid is divided into four quadrants by a vertical line and a horizontal line. The top-left quadrant is labeled 'C', the top-right 'E', the bottom-left 'C', and the bottom-right 'E'. The grid is composed of a 4x4 arrangement of smaller squares, each containing a letter. The letters are arranged in a repeating pattern of 'C' and 'E'.

## TRANSMITTAL DOCUMENT

### 1. NAME & ADDRESS OF SUBMITTER AND SPONSOR

**Submitter:**

Laird's Regulatory Consultants, Inc.  
Shenstone Estates  
17804 Braemar Place  
Leesburg, VA 20175-7046

**Sponsor:**

Wego Chemical and Mineral  
239 Great Neck Road  
Great Neck, New York 11021

### 2. REGULATORY ACTION TO BE TAKEN

Application for Registration of a Me-too Product

EPA File Symbol/Reg. No.: 83525 -

Product Name: WEGOCIDE THPS 75

TRANSMITTAL DATE

February 4, 2012

LIST OF SUBMITTED STUDIES

Volume 1: Administrative Materials  
48740101 Volume 2: Chemistry

Company Official: Cuthbert Frederick /Regulatory manager

Company Contact: *Olivia D. Laird* Olivia D. Laird  
for Cuthbert Frederick

Phone: (703) 669-0509

VOLUME 2 of 2  
Chemistry

## Memorandum

Date: 2 / 23 / 12

To: PM 33, Regulatory Manager

From: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted to OPPIN.

**We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.**

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a: ☒ fully accepted submission  
☐ partially accepted submission  
☐ rejected submission



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

WASHINGTON, D.C. 20460

February 15, 2012

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

WEGO CHEMICAL & MINERAL CORP.  
239 GREAT NECK ROAD  
GREAT NECK, NY 11021

**Report of Analysis for Compliance with PR Notice 11-3**

Thank you for your submittal of 13-FEB-12. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 11-3. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

# Receipt for Section 3

S: 911602

Resubmission: ☒ Yes ☐ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☒ Yes ☐ No

Application Type: New Registration

Billable: ☐ Yes ☒ No

Print Letter

Enter More Information

Tracking

Company: 83525 WEGO CHEMICAL & MINERAL CORP.

V

Risk Manager: Antimicrobials Division, Risk Management Team 33

Product #: 83525-L Product Name: WEGOCIDE THPS 75

Override#:

Me Too

Section3: 33677-3

Me Too

Product Name: TOLCIDE PS75

Application Date: 08-Feb-2012



OPP Rec'd Date: 13-Feb-2012



Front End Date: 13-Feb-2012



Risk Manager Send Date:



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Studies

New Ingredient

Request Date:

New Ingredient

Received Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Receipt Content

Des

Study

View/Edit



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

February 29, 2012

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

WEGO CHEMICAL & MINERAL CORP.  
239 GREAT NECK ROAD  
GREAT NECK, NY 11021

Report of Analysis for Compliance with PR Notice 11-3

Thank you for your submittal of 08-FEB-12. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 11-3. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.



Receipt for Section 3

S: 911338

Regulatory Type: Product Registration - Section 3

Application Type: New Registration

Company: 83525 VEGO CHEMICAL & MINERAL CORP.

Risk Manager: Antimicrobials Division, Risk Management Team 33

Product #: 83525-L

Product Name: VEGOCIDE THPS 75

Override#:

Me Too Section3: 33677-3

Me Too Product Name: TOLCIDE PS75

Application Date: 04-Feb-2012

Front End Date: 08-Feb-2012

FFS Due Date:

OPP Target Date:

Fast Track:

Receipt Description: New registration

Form A:

Signature Date:

Resubmission: Yes No

Fee For Service: Yes No

Billable: Yes No

V

OPP Rec'vd Date: 08-Feb-2012

Risk Manager Send Date:

Negotiated Due Date:

New Ingredient:

Form B:

Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content	Des
Study	
Paper Label	

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Figure 1 displays 16 different spatial arrangements of four points labeled A, B, C, and D, organized in a 4x4 grid. Each small diagram shows a unique configuration of these points in a 2D plane, representing all possible permutations of their relative positions.

## Memorandum

Date: 3 / 1 / 12

To: PM 33, Regulatory Manager

From: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted to OPPIN.

**We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.**

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a: ☒ fully accepted submission  
☐ partially accepted submission  
☐ rejected submission

**\*Confidential Statement of Formula may be entitled to confidential treatment\***